

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BLACK WOLF CONSULTING, INC. )

Plaintiff, )

vs. )

Case No. 1:18-cv-00108

AEU BENEFITS, LLC, AEU HOLDINGS, LLC, )  
STEPHEN M. SATLER, an individual, STEVEN )  
GOLDBERG, an individual, VERITAS HEALTH )  
SYSTEMS ADMINISTRATOR AND )

**JURY TRIAL DEMANDED**

INSURANCE SERVICES, INC., VERITAS PEO )  
LLC, CHARLES LAMANTIA, an individual, )  
JAMES D'IORIO, an individual, SD TRUST )  
ADVISORS, L.L.C. d/b/a SD TRUST ADVISORS )  
LLC OR SD INVESTMENT ADVISORS LLC, )  
THOMAS B. STOUGHTON, an individual, )  
TALL TREE ADMINISTRATORS, LLC, )  
MARK SELMAN, an individual, BENEFIT )  
PLAN ADMINISTRATORS, INC., THOMAS )  
CARDWELL, an individual, AND DOES 1-10, )

Defendants. )

**UNOPPOSED MOTION FOR EXTENSION OF PAGE LIMITATION  
FOR PLAINTIFF'S OMNIBUS MEMORANDUM IN OPPOSITION TO  
DEFENDANTS' MOTIONS TO DISMISS**

Plaintiff Black Wolf Consulting, Inc. ("Black Wolf") hereby requests permission to file its omnibus memorandum not to exceed 20 pages in response to Defendants' separate Motions to Dismiss Plaintiff's Complaint.

1. Pursuant to Local Rule 7.1, Plaintiff's response may not exceed fifteen pages.
2. Due to the number of defendants, and the number of issues raised in Defendants' separate Motions to Dismiss, Black Wolf respectfully requests the Court for an Order granting Black Wolf an additional five (5) pages (for a total of twenty (20) pages) for its Omnibus Memorandum in Opposition to Defendants' Motions to Dismiss.

3. Defendants do not object to this extension of Black Wolf's page limitation.

**WHEREFORE**, Plaintiff, Black Wolf, requests that the Court enter an Order granting this Motion, extending the page limitation for its Omnibus Memorandum in Opposition to Defendants' Motions to Dismiss to a total of twenty (20) pages, and such other further relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED,

BLACK WOLF CONSULTING, INC.

DEFENDANTS

/s/ Timothy Ray

/s/ Lyndsay I. Ignasiak

Timothy Ray (#6230099)  
Rachel C. Agius (#6322386)  
Tammy Tabush (#6327671)  
HOLLAND & KNIGHT LLP  
131 S. Dearborn St., 30<sup>th</sup> Floor  
Chicago, Illinois 60603  
(312) 263-3600  
Fax: (312) 578-6666  
[Timothy.ray@hklaw.com](mailto:Timothy.ray@hklaw.com)  
[Rachel.agius@hklaw.com](mailto:Rachel.agius@hklaw.com)  
[Tammy.tabush@hklaw.com](mailto:Tammy.tabush@hklaw.com)

Lyndsay I. Ignasiak  
Logan C. Hughes  
REMINGER CO., L.P.A.  
College Park Plaza  
8909 Purdue Road, Suite 200  
Indianapolis, IN 46268  
Tel: (317) 853-7372  
Fax: (317) 228-0943  
[lignasiak@reminger.com](mailto:lignasiak@reminger.com)  
[lhughes@reminger.com](mailto:lhughes@reminger.com)

/s/ Steven Press

BAKER DONELSON BEARMAN  
CALDWELL &  
BERKOWITZ, PC  
Baker Donelson Center, Suite 800  
211 Commerce Street  
Nashville, TN 37201  
[spress@bakerdonelson.com](mailto:spress@bakerdonelson.com)

Howard L. Mocerf  
mocerfh@gtlaw.com  
Elizabeth Susan Ralph  
Greenberg Traurig LLP  
Tiffany S. Fordyce  
fordycet@gtlaw.com  
77 W. Wacker Dr.  
Suite 3100  
Chicago, IL 60601

(312) 476-5014  
ralphe@gtlaw.com

/s/ Elliot A. Hallak

Harris Beach PLLC  
Elliot A. Hallak, Esq.  
*Admitted Pro Hac Vice*  
677 Broadway, Suite 1101  
Albany, New York 12207  
Telephone: (518) 701-2748  
Facsimile: (518) 427-0235  
[ehallak@harrisbeach.com](mailto:ehallak@harrisbeach.com)

/s/ John D. Dalton

John D. Dalton (ARDC No. 6197108)  
Monica V. Banasiuk (ARDC No. 6310967)  
Kaufman Dolowich & Voluck, LLP  
135 S. LaSalle Street, Suite 2100  
Chicago, Illinois 60601  
(312) 759-1400

/s/ Drew G.A. Peel

Drew G.A. Peel (ARDC# 6209713)  
Kevin B. Duff (ARDC# 6210491)  
RACHLIS DUFF ADLER PEEL &  
KAPLAN, LLC  
542 South Dearborn Street, Suite 900  
Chicago, Illinois 60605  
(312) 733-3950 (gen.)  
(312) 733-3952 (fax)  
[dpeel@rdaplax.net](mailto:dpeel@rdaplax.net)  
[kduff@rdaplax.net](mailto:kduff@rdaplax.net)

Christopher A. Smith (Admitted *Pro Hac Vice*)

TRIVELLA & FORTE, LLP  
1311 Mamaroneck Ave., Suite 170  
White Plains, New York 10605  
(914) 949-9075 (gen.)  
(914) 949-4752 (fax)  
[111csmith111@gmail.com](mailto:111csmith111@gmail.com)

/s/ Terrence P. Canade

Terrence P. Canade  
[tcnade@lockelord.com](mailto:tcnade@lockelord.com)  
LOCKE LORD LLP  
111 South Wacker Drive  
Chicago, Illinois 60606  
(312) 443-1862 (T. Canade)